

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EMERGING INDUSTRY TECHNOLOGIES, INC., d/b/a
SPENCE LABS,

Plaintiff,

v.

FIDELITY NATIONAL INFORMATION SERVICES,
INC.,

Defendant.

Case No.: 1:23-cv-05922

Steven C. Seeger, U.S.D.J.

Beth W. Jantz, U.S.M.J.

**PLAINTIFF’S MOTION FOR LEAVE TO WITHDRAW AND SUBSTITUTE LOCAL
COUNSEL**

Pursuant to Local Rule 83.17, Plaintiff Emerging Industry Technologies, Inc., d/b/a Spence Labs (“Spence” or “Plaintiff”) by and through its counsel moves the Court for leave to substitute the firm Forde & O’Meara LLP for Swanson, Martin & Bell, LLP as local counsel. In support of this motion, Plaintiff states as follows:

1. On August 23, 2023, Mr. William D. Patterson filed a Notice of Appearance to represent Spence in the above-captioned matter. (Dkt. No. 2.) On August 24, 2023, Mr. Benjamin Lothson filed a Notice of Appearance to represent Spence. (Dkt. No. 5.) On March 8, 2024 Ms. Kaitlyn Kloss filed a Notice of Appearance to represent Spence. (Dkt. No. 41.). On May 3, 2024 Ms. Nicole O’Toole filed a Notice of Appearance to represent Spence. (Dkt. No. 47.). On July 31, 2024 Mr. Jack A. Gould filed a Notice of Appearance to represent Spence. (Dkt. No. 59). The attorneys named in this paragraph being the “Swanson, Martin & Bell Attorneys”.

2. It is Spence's desire that Brian P. O'Meara, partner at Forde & O'Meara LLP, in good standing and properly admitted to this Court, substitute as counsel of record as local counsel with respect to Plaintiff's case. Spence has retained Forde & O'Meara LLP to act in that capacity.

3. Subject to being granted leave from this Court, the above-named Swanson, Martin & Bell Attorneys wish to withdraw from representing Spence. Further, upon leave of Court, Mr. O'Meara shall file his appearance.

4. The requested substitution of counsel will not prejudice Spence. Upon approval of this Court, Spence will continue to be represented by counsel from Kwun Bhansali Lazarus LLP, admitted *pro hac vice*, as well as Mr. O'Meara as local counsel.

5. Therefore, the Swanson, Martin & Bell Attorneys hereby move this Court for leave to withdraw their appearances as attorneys of record for Spence and Brian P. O'Meara hereby moves for leave to file their appearance as attorney of record.

WHEREFORE, Spence respectfully requests that this Court grant the foregoing motion for (a) withdrawal and substitution of the Swanson, Martin & Bell Attorneys, and (b) leave to file an appearance of Mr. O'Meara.

Dated: April 1, 2025

Respectfully Submitted,

/s/ William D. Patterson

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April 2025, a true and correct copy of the foregoing pleading or paper was served via ECF on all counsel of record.

/s/ William D. Patterson